

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

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| IN RE: | * |
| LUS ENEIDA HERNANDEZ SOSA | * CASE NO. 15-10080 MCF |
| Debtor(s) | * CHAPTER 13 |
| ----- | |
| BANCO POPULAR DE PUERTO RICO | * INDEX |
| Movant | * |
| LUZ ENEIDA HERNANDEZ SOSA | * |
| And JOSE CARRION MORALES | * |
| CHAPTER 13 TRUSTEE | * |
| Respondent | * |

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY
DOCKET NO. 16

TO THE HONORABLE COURT:

NOW COMES, LUZ ENEIDA HERNANDEZ SOSA, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On May 10, 2016, Banco Popular de Puerto Rico ("BPPR") filed a motion for relief from stay in the present bankruptcy case, docket no. 16, basically alleging that the debtor is in arrears in her post-petition direct mortgage loan payments to said creditor for the sum of \$3,650.08, including late charges, costs and attorneys fees.

2. The debtor respectfully submits that on May 21, 2016, she filed an *Amended Chapter 13 Plan*, docket entry no. 20, in order to provide for payment, through the Trustee of the sum of \$2,763.08, a partial balance on said post-petition arrears, and the difference of \$887.00 (May, 2016 monthly payment) to be paid directly by the debtor to BPPR, in order to cure the post-petition arrears, pursuant to BPPR's 362 motion, docket entry #16.

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Response 362 Motion
Case no. 15-10080 MCF13

3. Based on the aforestated, the debtor hereby respectfully requests this Honorable Court, upon confirmation of the debtor's proposed amended Plan (docket entry #20) to deny the motion requesting relief from stay filed by BPPR in the present case, docket no. 16.

WHEREFORE, debtor respectfully requests from this Honorable Court to deny the motion for relief from stay filed by BPPR, docket no. 16, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Chapter 13 Trustee, Jose R. Carrion Morales, Esq.; Sergio A. Ramirez de Arellano, Esq., Counsel for BPPR; I also certify that a copy of this motion was sent via regular mail to the debtor/respondent Luz Eneida Hernandez Sosa, Urb Los Flamboyanes 235 Calle Malaguetta Gurabo PR 00778.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 23rd day of May, 2016.

/s/Roberto Figueroa Carrasquillo
USDC #203614
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